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N. KELLY HOANG LAW FIRM
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 6
    NAGESH and ANITA SHETTY
7
                       UNITED STATES DISTRICT COURT
8
                      CENTRAL DISTRICT OF CALIFORNIA
                             SOUTHERN DIVISION
 9
                                        NO. SACV 12-930 DOC (MLGx)
    United States of America,
10
                   Plaintiff,
11
                                        SECOND STIPULATION TO EXTEND
                                        TIME TO RESPOND TO INTIAL
         VS.
12
                                        COMPLAINT; [PROPOSED] ORDER
                                        LODGED CONCURRENTLY
13
    Nagesh Shetty, et al.,
                                        Complaint Served: 10/24/12
14
                   Defendants.
                                        Current Response Date:
                                        12/14/12
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                                        New Response Date: 01/22/13
16
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         The parties by and through their respective counsel hereby
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    stipulate as follows:
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              Defendants Nagesh and Anita Shetty require additional
20
    time to answer the Complaint (1) To Reduce Federal Tax
21
    Assessments to Judgment; (2) For a Determination that Real
22
    Property is Titled to Richard D'Souza as Nominee or in Resulting
23
    Trust for the Benefit of Nagesh Shetty and Anita Shetty; (3) To
24
    Set Aside Fraudulent Transfer of Real Property from Nagesh
25
    Shetty and Anita Shetty to Richard D'Souza; and (4) To Foreclose
26
    Federal Tax Liens on Real Properties (the "Complaint") filed by
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1	plaintiff United States of America on or about June 11, 2012
2	(the "Complaint").
3	2. The holidays are quickly approaching with staff
4	unavailability becoming an issue.
5	3. Thus, defendants Nagesh and Anita Shetty shall have up
6	to and including January 22, 2013, to answer the Complaint.
7	4. A proposed order is concurrently lodged herewith.
8	IT IS SO STIPULATED.
9	Respectfully submitted,
10	
11	Dated: December /0 , 2012 N. KELLY HOANG LAW FIRM
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13	N. Kelly Hoang, Esq.
14	Attorney for Defendants
15	Nagesh and Anita Shetty
16	Dated: December <u>w</u> , 2012 <b>ANDRÉ BIROTTE</b> , JR.
17	United States Attorney SANDRA R. BROWN
18	Assistant United States Attorney Chief, Tax Division
19	Chief, lax bivision
20	025
21	Daniel Layton Assistant United States Attorney
22	Attorneys for Plaintiff
23	United States of America
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